

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY**

**Complaint on Sunday
and Holiday Collections**

Docket No. C2001-1

**DOUGLAS F. CARLSON
MOTION TO COMPEL THE UNITED STATES POSTAL SERVICE
TO RESPOND TO INTERROGATORIES DFC/USPS-19-21 — ERRATUM**

June 28, 2001

On June 26, 2001, I filed a motion to compel the Postal Service to respond to interrogatories DFC/USPS-19-21.¹ Since filing the motion, I have discovered the need to clarify two sentences on page 10. I also will provide an update on one matter discussed in the motion.

In the second line, the following sentence appears: "While the lawsuit was pending, I filed another FOIA request, requesting the same information but in electronic format." This sentence should read, "While the lawsuit was pending, I filed another FOIA request, this time requesting in electronic format a subset of the CBMS data that I had already received for Salem, Oregon."

In the second paragraph, the following sentence appears: "Third, the Postal Service has converted the data previously." This sentence should read, "Third, the Postal Service has converted CBMS data from a mainframe computer to a PC text file that Microsoft Excel can read."

¹ Douglas F. Carlson Motion to Compel the United States Postal Service to Respond to Interrogatories DFC/USPS-19-21, filed June 26, 2001.

I have attached a revised page 10.

I regret any confusion that these changes cause.

On page 22, I noted that I expected that the court handling my FOIA lawsuit would set a date for filing motions for summary judgment during a case-management conference on June 28, 2001. Due to a scheduling conflict, the court continued this conference to a later date to be determined by the court.

Respectfully submitted,



Dated: June 28, 2001

DOUGLAS F. CARLSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required parties in accordance with section 12 of the *Rules of Practice*.



DOUGLAS F. CARLSON

June 28, 2001
Santa Cruz, California

Postal Service disclosed some information and withheld other information. I filed a lawsuit in federal court to require disclosure of all the information. While the lawsuit was pending, I filed another FOIA request, this time requesting in electronic format a subset of the CBMS data that I had already received for Salem, Oregon. The purpose of this second FOIA request was to determine the feasibility of obtaining the information in Excel format, since the redacted information that the Postal Service provided to me previously appeared to have been downloaded into a spreadsheet.

This correspondence reveals four important facts that seriously undermine the Postal Service's credibility in asserting undue burden. First, converting the data from the mainframe computer to Excel format is possible. Second, the Postal Service knows how to convert it. Third, the Postal Service has converted CBMS data from a mainframe computer to a PC text file that Microsoft Excel can read. Fourth, the Postal Service required only one hour to research and format data for Salem, Oregon, in Excel 97 format, plus one minute of computer run time. While data for Salem, Oregon, represent only a subset of the data for the nation, a substantial possibility exists that setup and formatting comprised most of the one hour required to provide the data for Salem, Oregon, in Excel 97 format. Now that the formatting has been performed, it would not necessarily need to be performed again to respond to DFC/USPS-19. Moreover, converting only a subset of the data may require more programming work than simply downloading and converting all of it, as DFC/USPS-19 requests.

Contrary to the Postal Service's representations to the Commission, this conversion task does not appear to be unduly burdensome. In fact, the conversion task very well may require less than one hour of work. The process of quantifying the burden certainly is not unduly burdensome. If the Postal Service had bothered to check, it would have discovered that the conversion process was developed and performed successfully in the past at a nominal cost, and the process had already been documented in letters to me.

Lastly, modern PC's are able to process Excel files containing large numbers of records, and the Postal Service can save large files onto CD-ROM's. Thus, no